

Genesee Business Radio Systems, Inc.
PO Box 25
Pittsford, NY 14534-0025
Phone (585) 266-6373
MD Office (410) 431-5275

October 21, 2003

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

Re: Amendment of Sections 90.20 and 90.175 of the Commission's Rules for Frequency
Coordination of Public Safety Frequencies in the Private Land Mobile Radio Below-470
MHz Band – WT Docket No. 02-285

Dear Mr. Chairman:

APCO filed a *Petition for Rulemaking*, in the docket referenced above, seeking competitive frequency coordination in the public safety pool. In comments filed on the Petition, ITA suggested that the Commission "open up" frequency coordination in the public safety and industrial/business pools to additional competition by permitting all FCC-certified public safety and industrial/business coordinators to coordinate within either frequency pool. With this letter, we support ITA's comments and urge the Commission to permit competitive frequency coordination in both pools.

Genesee maintains a customer base of public safety and business groups that use our radio shop for private, internal communications solutions. Today, any business licensees can go to any non-public safety frequency coordinator for the necessary coordination. Public safety licenses, on the other hand, are limited to their pool-specific coordinator and do not benefit from the competitive nature that now drives the business pool. If industrial/business and public safety channels were open to competition by all FCC recognized coordinators, end users (like volunteer firefighting groups) would reap the benefits of competition. The benefits include more reliable, quicker, greater accuracy and cheaper services, all of which are much needed for the public safety community.

Considering the substantial benefits to the private land mobile community as a whole, Genesee supports ITA's proposal of open coordination competition in the public safety and industrial/business pools.

Sincerely,

Duncan C. Kennedy, III
President